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4 **THE UNITED STATES BANKRUPTCY COURT**  
5 **EASTERN DISTRICT OF MICHIGAN**  
**SOUTHERN DIVISION - DETROIT**

6 In re:

7 CITY OF DETROIT, MICHIGAN,

8 Debtor.

9 CITY OF DETROIT, MICHIGAN,

10 Plaintiff,

11 - against -

12 SAFECO INSURANCE COMPANY  
13 OF AMERICA,

14 Defendant.

Chapter 9 Proceeding

Case No.: 13-53846

Hon. Thomas J. Tucker

15 **CERTIFICATE OF SERVICE**

16 I hereby certify that on May 16, 2016, *Safeco's Response to City of Detroit's*  
17 *Status Report With Regard to Preference Actions* was electronically filed with the  
18 Clerk of the Court using the ECF system, and will send notification of such filing  
19 to all ECF participants registered in this matter.

20 DATED this 16<sup>th</sup> day of May, 2016.

21 JENNINGS, HAUG & CUNNINGHAM, LLP

22 /s/ Joseph A. Brophy

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of America